

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X  
VINCENT ALAIMO, SUSAN ALAIMO and  
MINETTE ALAIMO,

Plaintiffs,

-against-

GENERAL MOTORS CORPORATION,  
GENERAL MOTORS AND THEIR  
MANUFACTURERS, AGENTS, AND  
SUBCONTRACTORS AND THEIR EMPLOYEES  
AND/OR EXPERT WITNESSES, GERALD COOPER,  
JOHN W. MELVIN, BRIAN EVEREST AND DR.  
BRENT BENSON,

Defendants.  
-----X

Docket No.: 07 Civ 7624  
(CLB-MDF)

**AFFIDAVIT OF  
TIMOTHY J. McHUGH  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

State of New York                    )  
  )       ss.:  
County of New York                )

Timothy J. McHugh, Esq., being duly sworn, hereby deposes and says as follows:

1. I am shareholder at Lavin, O'Neil, Ricci, Cedrone & DiSipio, counsel for defendant, GENERAL MOTORS CORPORATION ("GM") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of GM's motion to admit Francis J. Grey, Jr., Esq., as counsel *pro hac vice* to represent GM in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1995. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Francis J. Grey, Jr., Esq. since 1997.

4. Mr. Grey is a shareholder at Lavin, O'Neil, Ricci, Cedrone & DiSipio.

5. I have found Mr. Grey to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.


6. Accordingly, I am pleased to move the admission of Francis J Grey, Jr., Esq., *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Francis J. Grey, Jr., *pro hac vice*, which is attached hereto as *Exhibit "B"*.

**WHEREFORE**, it is respectfully requested that the motion to admit Francis J. Grey, Jr., Esq., *pro hac vice*, to represent defendant, GENERAL MOTORS CORPORATION, in the above captioned matter, be granted.

Dated: September 25, 2007  
New York, New York

Sworn to me before this  
25 day of September, 2007

  
Notary Public

**ARTHUR F. DEL PRINCIPE**  
Notary Public State of New York  
No. 02DE6139458  
Qualified in Bronx County  
Commission Expires January 9, 2010

Respectfully Submitted:

  
Timothy J. McHugh, Esq. (3393)

**LAVIN, O'NEIL, RICCI, CEDRONE & DISIPIO**

Attorneys for Defendant

GENERAL MOTORS CORPORATION

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**Our File No.: 7600-80260**